

Exhibit U

Honorable Robert J. Bryan

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GEORGE DC PARKER II and LORI A.
PARKER,

Plaintiffs,

v.

THE SOCIETY FOR CREATIVE
ANACHRONISM, INC., a/k/a/ "SCA" or "SCA,
Inc.", et.al,

Defendant.

Case No. 3:23-cv-05069-RJB

PLAINTIFFS GEORGE
DC PARKER II AND LORI A. PARKER
FIRST INTERROGATORIES AND
REQUESTS TO DEFENDANT THE
SOCIETY FOR CREATIVE ANACHRONISM,
INC. **AND RESPONSES AND OBJECTIONS
THERETO**

TO: Plaintiffs George DC Parker II and Lori A. Parker.

COMES NOW, Defendant The Society for Creative Anachronism, Inc., a/k/a "SCA" or "SCA, Inc.", ("SCA"), by and through its attorneys, Justin E. Bolster and Debra Dickerson, with the law firm Preg O'Donnell & Gillett, PLLC, hereby submits its answers, responses, and objections to Plaintiff's First Set of Interrogatories and Requests for Production as set forth below:

GENERAL OBJECTIONS

SCA generally objects each interrogatory and request for production in Plaintiff's First Set of Interrogatories and Requests for Production to SCA to the extent they seek information protected by the attorney-client privilege or work product doctrine. Nothing contained in these answers and responses is intended as, or shall in any way be deemed, a waiver of any attorney-

PLAINTIFFS FIRST INTERROGATORIES AND
REQUESTS TO DEFENDANT AND RESPONSES AND
OBJECTIONS THERETO - 1
11010-0002 5937538
Case No. 3:23-cv-05069-RJB

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1 client privilege, any work product protection or any other applicable privilege or doctrine. In
2 responding to each interrogatory and request for production, SCA will not undertake to provide
3 privileged or otherwise protected information.

4 SCA generally objects to each interrogatory and request for production to the extent that
5 the information sought is not relevant to the subject matter of this action or reasonably calculated
6 to lead to the discovery of admissible evidence. In addition, SCA generally objects to each
7 interrogatory and request for production to the extent that providing the requested information
8 would be unduly burdensome and expensive. Furthermore, SCA reserves the right to reassert
9 this objection in the event Plaintiff seeks additional information or any party seeks to introduce at
10 trial any response to these interrogatories and requests for production.

11 SCA objects to Plaintiff's definitions to the extent that they assume facts not in evidence
12 and/or are vague, overly broad, ambiguous and indefinite as to time, scope and subject matter.

13 SCA generally objects to each interrogatory and request for production to the extent they
14 seek information not available to SCA or in SCA's possession, custody or control. In responding,
15 SCA will not attempt to provide information which is unavailable or not within SCA's possession,
16 custody, or control.

17 SCA provides the responses herein without waiving any of its objections herein.

18 SCA generally objects to the instructions to the extent they seek to impose requirements
19 or obligations on SCA in addition to or different from those imposed by the Federal Rules of Civil
20 Procedure, Evidence Rules, other applicable rules, or to the extent the definitions are inconsistent
21 with SCA's objections, answers or responses. In responding to each interrogatory and request
22 for production, SCA will only provide such information as is required and proper under the Rules.
23 SCA is not bound by Plaintiffs' unilateral instructions and definitions and will only respond to
24 Plaintiffs' discovery requests within the requirements of the Federal Rules of Civil Procedure
25

Rules for the Western District of Washington Federal Court.

In providing the following answers and responses, SCA does not waive but rather preserves the following rights and reservations:

a. SCA expressly reserves the right to all objections as to relevancy, competency, materiality, propriety, and admissibility, that would require the exclusion of any statement contained herein or in any document referenced to the extent any such answer, response or document is sought to be introduced into evidence at any hearing or trial in this action;

b. SCA expressly reserves the right to object on any grounds as to the use or admissibility of the answers and responses herein, or documents produced by SCA, in any subsequent proceedings, including the trial of this or any other action;

c. SCA expressly reserves the right to object on any ground and/or further discovery requests propounded by Plaintiff.

d. SCA has not yet completed its investigation of the facts relating to this action. The following answers and responses are based upon information and documents presently known to SCA and are therefore made without prejudice to SCA's right to produce subsequently discovered evidence relating to the proof of presently known material facts and to produce all evidence, whenever discovered, in any form, relating to the proof of subsequently discovered material facts.

e. Except for explicit facts stated herein, or in any documents referenced in connection herewith, no admission of any nature whatsoever is intended, and none should be implied or inferred.

f. SCA's response to each individual interrogatory and request for production is submitted without prejudice to, and without in any respect waiving, these general objections.

g. SCA reserves the right to reassert these objections in the event Plaintiff seeks additional information or documents, or if any party seeks to introduce at trial any response to

these interrogatories and requests for production.

SCA objects to each request for production, instruction, and definition on all of the grounds set forth in these General Objections and incorporates those objections into each interrogatory and request for production answer and response as if set forth in full therein.

The following answers and responses are based upon SCA's current knowledge, information, and belief. Discovery in this matter and SCA's investigation of the subject matter of this action are ongoing. Accordingly, SCA reserves the right to modify, correct, supplement, or clarify its objections, answers, or responses.

INTERROGATORY NO. 1: What binding actions, authorities and/or powers were granted to the Officers prior to April 2, 2021, up to and including but not limited to all sanctions they have the right to levy, what criteria will be used in deciding those sanctions, and what infractions by the members might warrant such sanctions?

ANSWER:

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the discovery of admissible evidence to identify each and every power or right conveyed to the Officers over the years. The request is also not reasonably limited in time or place as the request ostensibly seeks the authorities of the Officers from the inception of SCA up to April 2, 2021, most of which cannot have any bearing on the claims or issues raised in this lawsuit. SCA further objects to the extent that it seeks information and documents protected by attorney-client privilege and/or work product privilege and/or information collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985)). SCA further objects to the scope of the request as it is overly broad and

This is a
Boilerplate
Objection

unduly burdensome regarding "the powers, actions, and authorities of the

Officers." There are twenty kingdoms with approximately 30 subgroups each. Each has their own documents, handbooks and other governing documents. Subject to and without waiving the foregoing objections, see Bates Nos. SCA_000259-000431.

REQUEST FOR PRODUCTION NO. 1: Please provide all documentation of any rules that were in effect prior to April 1, 2021 that supports your answer in Interrogatory No. 1

RESPONSE:

See Answer to Interrogatory No. 1.

REQUEST FOR PRODUCTION NO. 2: Please provide all communications and documents that include or reference the names of Plaintiffs, and their business, including any previous investigations wherein the Plaintiffs are named.

RESPONSE:

This is a Boilerplate Objection

Objection, this request is overbroad, unduly burdensome, and not reasonably limited to the needs of this case. Plaintiffs were members of SCA for several decades and it is not reasonable to identify every communication that references either plaintiff.

Without waiver of that objection, the following documents were identified that reference complaints against the Plaintiffs and the investigation material related to the same. See Bates Nos. SCA_000001-000002, SCA_000014-000054 and SCA_000121-000258.

Discovery is continuing and additional documents will be produced if they are discovered.

The time frame was addressed in Plaintiff's instructions, defendants chose to ignore them

1 INTERROGATORY NO. 2: Describe in detail what training Officers are required to have prior to
2 taking office and/or what training an Officer is required to receive after taking office in relation to
3 their duties and responsibilities of their respective position within the organization?

4 ANSWER:

This is a Boilerplate Objection

5 SCA objects to this interrogatory to the extent that it is overly broad, unduly
6 burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the
7 discovery of admissible evidence. The request is also not reasonably limited in time or
8 place as the request ostensibly seeks information related to the "training" of all Officers
9 from the inception of SCA to present, most of which cannot have any bearing on the
10 claims or issues raised in this lawsuit. SCA is also unclear what Plaintiffs are referring to
11 by the word "training" related to Officers. SCA further objects to the extent that it seeks
12 information and documents protected by attorney-client privilege and/or work product
13 privilege and/or information collected in anticipation of litigation (see *Heidebrink v.*
14 *Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985)). Subject to an understanding that what is
15 sought is information related to Officers who were involved in the exile or revocation and
16 denial of membership action related to Plaintiffs, and without waiving the foregoing
17 objections, see Bates Nos. SCA_000259-000421.

Any reasonable person understands the meaning of the word "training".

Persuant to Rule 26(b)(5) Defendants are required to state what is being claimed as privilege and how it qualifies as such.

18
19 REQUEST FOR PRODUCTION 3: Please provide all documentation of any rules that supports
20 your answer to interrogatory question no. 2.

21 RESPONSE:

This is a Boilerplate Objection

22 Objection, this request is vague, overbroad and not reasonably limited in time or
23 space and appears to be offered to harass SCA and increase the costs of litigation.
24 Without waiver of that objection, see Answer to Interrogatory No. 2.
25

1 **INTERROGATORY NO. 3:** Please describe in detail the conflict resolution training Officers are
2 required to participate in.

3 **ANSWER:** **This is a Boilerplate Objection**

4 **Objection, this request is not reasonably limited in time or scope.** To the extent
5 this requested information is from 2018 to present regarding SCA Society level Officers
6 and Officers from the Kingdom of An Tir, see Answer to Interrogatory No. 2.

7 **Defendant's answer to Interrogatory No. 2 was a broad objection to training in general, however Interrogatory No.**
8 **3 is about specific training, the scope of which was limited in the "instructions" section.**

9 **REQUEST FOR PRODUCTION 4:** Please provide all documentation of any rules that were in
10 effect prior to April 1, 2021, that outlines all criteria by which the BOD determines that a case
11 brought to them necessitates further investigation for a revocation of membership.

12 **RESPONSE:** **This is a Boilerplate Objection and is also nonresponsive as the answer to**
13 **Interrogatory No. 2 is non-applicable to this question.**

14 **Objection, this request is not reasonably limited in time or scope. To the extent**
15 **this requested is information from 2018 to April 1, 2021, see Answer to Interrogatory No.**
16 **2.**

17 **REQUEST FOR PRODUCTION NO. 5:** Please provide all documentation of any rules that
18 outline any documentation required for the BOD to bring sanctions, including but not limited to,
19 standards of proof required to lend merit to any allegations made against a member being
20 considered for sanctions.

21 **RESPONSE:** **This is a Boilerplate Objection . again, time and scope is addressed in the Instructions**
22 **section.**

23 **SCA objects to this interrogatory to the extent that it is overly broad, unduly**
24 **burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the**
25 **discovery of admissible evidence. The request is not reasonably limited in time or scope.**

Persuant to Rule 26(b)(5)

Defendants are required to state what is being claimed as privilege and how it quilifies as such.

SCA further objects to the extent that it seeks information and documents protected by attorney-client privilege and/or work product privilege and/or information collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985). Subject to the understanding that what is sought are documentation of rules that were in place between 2018 and present, and without waiving the foregoing objections, see Bates Nos. SCA_000259-000421.

Defendant fail to specify exactly what rule they are quoting in the 162 pages of documentation they are in reference to.

REQUEST FOR PRODUCTION NO. 6: Please provide all documentation of any rules that were in effect prior to April 1, 2021 that outlines how the Officers are chosen.

RESPONSE: This is a Boilerplate Objection and non-resopnsive as Interrogatory No. 2 is irrelevant to this question.

Objection, this request is overly broad and not reasonably limited in time or scope. Subject to the understand that what is sought are documents regarding rules that were in effect between 2018 and present, see Answer to Interrogatory No. 2.

REQUEST FOR PRODUCTION NO. 7: Please provide all documentation of any rules that outline all required qualifications for Officers.

RESPONSE: This is a Boilerplate Objection Additionally, Persuant to Rule 26(b)(5) Defendants are required to state what is being claimed as privelage and how it quilifies as such.

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the discovery of admissible evidence to identify each and every power or right conveyed to the Officers over the years. SCA further objects to the extent that it seeks information and documents protected by attorney-client privilege and/or work product privilege and/or information collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985). SCA further objects to the scope of the request as it is

Defendant fail to specify exactly what rule they are quoting in the 162 pages of documentation they are in reference to. Highlighted section was not asked in this question, therefore, it is irrelevant and non-responsive. Scope is addressed in instructions.

overly broad and unduly burdensome regarding "the powers, actions, and authorities of the Officers." There are twenty kingdoms with approximately 30 subgroups each. Each has their own documents, handbooks and other governing documents. Subject to and without waiving the foregoing objections, see Bates Nos. 000259-000421.

REQUEST FOR PRODUCTION NO. 8: Please provide all communications and documentation relating to the appointment of the Baron and Baroness for the Barony of Blatha An Or in 2017 - 2020, including but not limited to polling sheets, letters of recommendation, letters opposing any candidates, email, texts or any other written communications in reference to the candidates for those polling years.

RESPONSE: This is a Boilerplate Objection. Additionally, Pursuant to Rule 26(b)(5) Defendants are required to state what is being claimed as privilege and how it qualifies as such. Defendants must show cause for a protective order.

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the discovery of admissible evidence to identify each and every power or right conveyed to the Officers over the years. SCA further objects to the extent that it seeks information and documents protected by attorney-client privilege and/or work product privilege and/or information collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985)). Subject to and without waiving the foregoing objections, SCA is willing to enter into a protective order and discuss what responsive documents can reasonably be produced.

REQUEST FOR PRODUCTION NO. 9: Please provide all documentation of any rules that outlines what legally binding actions/authorities/powers are granted to the seneschals, including

but not limited to all sanctions they have the right/power to levy, what criteria will be used in deciding those sanctions, and what infractions by the members might warrant such sanctions.

RESPONSE: *This is a Boilerplate Objection Additionally, Pursuant to Rule 26(b)(5) Defendants are required to state what is being claimed as privilege and how it quilifies as such.*

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the discovery of admissible evidence. SCA further objects to the extent that it seeks information and documents protected by attorney-client privilege and/or work product privilege and/or information collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985)). SCA further objects to the scope of the request as it is overly broad and unduly burdensome regarding the powers, actions, and authorities of the seneschals. Subject to and without waiving the foregoing objections, see Bates Nos. 000259-000421.

REQUEST FOR PRODUCTION NO. 10: Please provide all documentation of all members who have had their membership revoked in the past 10 years.

RESPONSE: *This is a Boilerplate Objection Additionally, Pursuant to Rule 26(b)(5) Defendants are required to state what is being claimed as privilege and how it quilifies as such.*

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the discovery of admissible evidence. See also *Guthrey v. California Dept. of Corrections and Rehabilitation*, 2012 WL 2499938 at *15 (The ten-year time frame for which Plaintiff sought information regarding other claims was irrelevant, overbroad and unduly burdensome) and *Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C. 2002) (“Ten years is an inordinate length of time to support plaintiffs’ pattern of discrimination theory....in order to establish a pattern of discrimination, three years is a reasonable time in which to allow

1 discovery.”) SCA further objects to the extent that it seeks information and documents
2 protected by attorney-client privilege and/or work product privilege and/or information
3 collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d
4 212 (1985). Subject to and without waiving the foregoing objections, SCA is willing to
5 enter into a protective order and to discuss reasonable parameters for comparator
6 membership revocation matters.

7
8 **INTERROGATORY NO. 4:** Describe in detail the infractions that resulted in revocation of
9 memberships in the last 10 years.

10 **ANSWER:** **This is a Boilerplate Objection. Additionally, Pursuant to Rule 26(b)(5) Defendants**
are required to state what is being claimed as privilege and how it qualifies as such.

11 SCA objects to this interrogatory to the extent that it is overly broad, unduly
12 burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the
13 discovery of admissible evidence. See also *Guthrey v. California Dept. of Corrections*
14 *and Rehabilitation*, 2012 WL 2499938 at *15 (The ten-year time frame for which Plaintiff
15 sought information regarding other claims was irrelevant, overbroad and unduly
16 burdensome) and *Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C. 2002) (“Ten years is an
17 inordinate length of time to support plaintiffs’ pattern of discrimination theory....in order
18 to establish a pattern of discrimination, three years is a reasonable time in which to allow
19 discovery.”) SCA further objects to the extent that it seeks information and documents
20 protected by attorney-client privilege and/or work product privilege and/or information
21 collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d
22 212 (1985). Subject to and without waiving the foregoing objections, SCA is willing to
23 enter into a protective order and to discuss reasonable parameters for comparator
24 membership revocation matters.
25

1 **REQUEST FOR PRODUCTION NO. 11:** Please provide all documentation that shows the total
2 number of members who have had their membership revoked who were from the Kingdom of
3 An Tir in the last 10 years.

4 **RESPONSE:**

5 **SCA objects to this interrogatory to the extent that it is overly broad, unduly**
6 **burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the**
7 **discovery of admissible evidence. See also *Guthrey v. California Dept. of Corrections***
8 ***and Rehabilitation*, 2012 WL 2499938 at *15 (The ten-year time frame for which Plaintiff**
9 **sought information regarding other claims was irrelevant, overbroad and unduly**
10 **burdensome) and *Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C. 2002) (“Ten years is an**
11 **inordinate length of time to support plaintiffs’ pattern of discrimination theory....in order**
12 **to establish a pattern of discrimination, three years is a reasonable time in which to allow**
13 **discovery.”)**

14 **Subject to and without waiving the foregoing objections, SCA is willing to enter**
15 **into a protective order and to discuss reasonable parameters for comparator**
16 **membership revocation matters. However, there have been eighteen (18) member**
17 **revocation(s) from the Kingdom of An Tir in the last five years.**

18
19 **REQUEST FOR PRODUCTION NO. 12:** Please provide all documentation that shows the total
20 number of members who have had their membership revoked within the Kingdom of An Tir that
21 were, or claimed to be DEI (Diversity, Equity and Inclusion) related or who raised questions of
22 DEI aspects during the investigation into the incident and/or actions that led to the Revocation.

23 **RESPONSE:**
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This is a Boilerplate Objection. Additionally, Pursuant to Rule 26(b)(5) Defendants are required to state what is being claimed as privilege and how it qualifies as such. Furthermore, Defendant states claims and conclusions without supporting documentation.

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the discovery of admissible evidence. See also *Guthrey v. California Dept. of Corrections and Rehabilitation*, 2012 WL 2499938 at *15 (The ten-year time frame for which Plaintiff sought information regarding other claims was irrelevant, overbroad and unduly burdensome) and *Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C. 2002) (“Ten years is an inordinate length of time to support plaintiffs’ pattern of discrimination theory....in order to establish a pattern of discrimination, three years is a reasonable time in which to allow discovery.”).

Without waiving the above objections, of the 18 revocations identified above this is the only revocation where the member asserted autism as an element of the revocation. SCA is aware of two other revocations of An Tir members where one member mentioned they were working on mental health issues and one person mentioned they were an indigenous person, but that classification was unrelated to their revocation.

REQUEST FOR PRODUCTION NO 13: Please provide all documentation of any rules that outlines the criteria and/or qualifications for any level investigator.

This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Defendant fail to specify exactly what rule they are quoting in the 162 pages of documentation they are in reference to.

SCA objects that this request is not reasonably limited in time or scope and ostensibly asks for information from each of the twenty kingdoms along with thirty subgroups each. Each has their own documents, handbooks and other governing documents. Subject to and without waiving the foregoing objections and in an effort to provide a response, please see Bates Nos. 000259-000421.

1 **INTERROGATORY NO. 5:** Please describe in detail any rules that outlines all training an
2 investigator, at any level, shall or has received in relation to conducting such an investigation,
3 including but not limited to dispute resolution training, investigation training, interrogation
4 training, knowledge or experience with dispute resolution laws and regulations, knowledge of or
5 experience in managing and resolving disputes effectively.

6 **ANSWER:** *This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Defendant
7 fail to specify exactly what rule they are quoting in the 162 pages of documentation they are in
8 reference to. Pursuant to Rule 26(b)(5) Defendants are required to state what is being claimed as
9 privilege and how it qualifies as such.*

10 **SCA objects to this interrogatory to the extent that it is overly broad, unduly**
11 **burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the**
12 **discovery of admissible evidence to identify all training that an investigator has received**
13 **at any level, including investigators in one of the other nineteen Kingdoms. The request**
14 **is not reasonably limited in time or scope. SCA further objects to the extent that it seeks**
15 **information and documents protected by attorney-client privilege and/or work product**
16 **privilege and/or information collected in anticipation of litigation (see *Heidebrink v.***
17 ***Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985). Subject to and without waiving the**
18 **foregoing objections and in an effort to provide a response, please see Bates Nos.**
19 **000259-000421.**

20 **REQUEST FOR PRODUCTION NO. 14:** Please provide all documentation in support of your
21 answer to interrogatory no 5.

22 **RESPONSE:** *Non-responsive*

23 **See Answer to Interrogatory No. 5.**
24
25

1 **INTERROGATORY NO. 6:** Please describe in detail any rules that outline what the corporate
2 dispute policies and resolution paths were prior to April 2, 2021 including who presides over
3 dispute matters, what qualifications are required for the dispute advocates/judges etc.

4 **ANSWER:** This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Defendant
5 fail to specify exactly what rule they are quoting in the 172 pages of documentation they are in
6 reference to.

7 **SCA objects that this request is not reasonably limited in time or scope as it seeks**
8 **any rules related to dispute resolution policies from the beginning of the SCA to April 2,**
9 **2021, spanning over 50 years. In an effort to provide a response, see Bates Nos.**
10 **SCA_000259-000431.**

11 **REQUEST FOR PRODUCTION NO. 15:** Please provide all documentation of training, including
12 dispute resolution training, for all seneschals and investigators for the last 10 years.

13 **RESPONSE:** This is a Boilerplate Objection , Defendant failed to provide any supporting
14 documentation.

15 **SCA objects to this interrogatory to the extent that it is overly broad, unduly**
16 **burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the**
17 **discovery of admissible evidence to identify information related to the nineteen other**
18 **Kingdoms whose rules and policies are not implicate in this matter. The request is also**
19 **not reasonably limited in time or scope. See also *Guthrey v. California Dept. of***
20 ***Corrections and Rehabilitation*, 2012 WL 2499938 at *15 (The ten-year time frame for**
21 **which Plaintiff sought information regarding other claims was irrelevant, overbroad and**
22 **unduly burdensome) and *Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C. 2002) (“Ten years**
23 **is an inordinate length of time to support plaintiffs’ pattern of discrimination theory....in**
24 **order to establish a pattern of discrimination, three years is a reasonable time in which to**
25 **allow discovery.”) SCA further objects to the extent that it seeks information and**
documents protected by attorney-client privilege and/or work product privilege and/or

information collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985)). Subject to and without waiving the foregoing objections, Kingdom seneschals are instructed to read the Seneschal's Handbook, Sanctions Policies and Procedures Manual, and Investigator's Guide, and to be familiar with the Governing Documents and their own kingdom laws. There was a seneschal symposium held in 2019 in-person that was attended by most of the kingdom seneschals. In 2022 Lis Schraer provided a training class for new kingdom seneschals, along with two investigation trainings for seneschals. Zoom meetings with kingdom seneschals are held by SCA approximately once a quarter to address common issues and questions.

INTERROGATORY NO. 7 Please describe in detail any rules that outline the criteria for determining whether or not an appeal should be heard and who makes that determination.

ANSWER: **This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Non-responsive as Defendant answers elements to questions not asked.**

SCA objects to the request as it is not reasonably limited in time or scope. With the understanding what is sought are rules and criteria for whether an appeal should have been heard related to Plaintiffs' exile or the revocation of membership for George Parker, see Bates Nos. SCA_000259-000421.

Defendant fail to specify exactly what rule they are quoting in the 162 pages of documentation they are in reference to.

REQUEST FOR PRODUCTION NO. 16: Please provide all documentation in support of your answer to Interrogatory no 7.

RESPONSE: **Non-responsive Defendant fail to specify exactly what rule they are quoting in the 162 pages of documentation they are in reference to.**

See Answer to Interrogatory No. 7.

1 **INTERROGATORY NO. 8:** Please describe in detail, how many requests for appeal has the
2 seneschal received in the past 10 years, including dates for each appeal, and of those, how
3 many have been heard by the BOD for the same period.

4 **ANSWER:** **This is a Boilerplate Objection. Time and scope is addressed in the Instructions**
5 **section.**

6 **SCA objects to this interrogatory to the extent that it is overly broad, unduly**
7 **burdensome, and not reasonably calculated to lead to the discovery of admissible**
8 **evidence. The request is not reasonably limited in time or scope. See also *Guthrey v.***
9 ***California Dept. of Corrections and Rehabilitation*, 2012 WL 2499938 at *15 (The ten-year**
10 **time frame for which Plaintiff sought information regarding other claims was irrelevant,**
11 **overbroad and unduly burdensome) and *Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C.**
12 **2002) (“Ten years is an inordinate length of time to support plaintiffs’ pattern of**
13 **discrimination theory....in order to establish a pattern of discrimination, three years is a**
14 **reasonable time in which to allow discovery.”). The request ostensibly calls for the**
15 **evaluation and analysis of reports to hundreds of different seneschals in over twenty**
16 **kingdoms with approximately 30 subgroups each with various seneschals for each**
17 **kingdom. SCA is willing to conduct a discovery conference to discuss a reasonable**
18 **scope for this request.**

19 **REQUEST FOR PRODUCTION NO. 17:** Please provide all documentation that supports your
20 answer to question no. 8.

21 **RESPONSE:**

22 **See Answer to Interrogatory No. 8.**
23
24
25

1 **INTERROGATORY NO. 9:** Please describe in detail, out of the number listed in Interrogatory
2 No. 8, the number of revocations that have been successfully overturned by appeal.

3 **ANSWER:** **This is a Boilerplate Objection. Time and scope is addressed in the Instructions**
4 **section.**

5 **SCA objects that this request is overbroad, unduly burdensome and not**
6 **reasonably limited in time or scope. The request seeks information related to appeals in**
7 **twenty different kingdoms over the past 10 years that have no relationship to Plaintiffs'**
8 **allegations. Furthermore, the 10-year window is too broad. *Guthrey v. California Dept. of***
9 ***Corrections and Rehabilitation*, 2012 WL 2499938 at *15 (The ten-year time frame for**
10 **which Plaintiff sought information regarding other claims was irrelevant, overbroad and**
11 **unduly burdensome) and *Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C. 2002) ("Ten years**
12 **is an inordinate length of time to support plaintiffs' pattern of discrimination theory....in**
13 **order to establish a pattern of discrimination, three years is a reasonable time in which to**
14 **allow discovery."). SCA is willing to conduct a discovery conference to discuss a**
15 **reasonable scope for this request.**

16 **REQUEST FOR PRODUCTION NO. 18:** Please provide all documentation that supports your
17 answer to Interrogatory No. 9.

18 **RESPONSE:**

19 **See Answer to Interrogatory No. 9.**
20

21 **INTERROGATORY NO. 10:** Please describe in detail the **number of sanctions** requested by
22 kingdoms in the past 10 years, including dates listed by kingdom.

23 **ANSWER:**
24
25

This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Answers questions not asked. This questions asks about sanctions not appeals.

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the discovery of admissible evidence. The request seeks information **n related to appeals in** twenty different kingdoms over the past 10 years that have no relationship to Plaintiffs' allegations. Furthermore, the 10-year window is too broad. *Guthrey v. California Dept. of Corrections and Rehabilitation*, 2012 WL 2499938 at *15 (The ten-year time frame for which Plaintiff sought information regarding other claims was irrelevant, overbroad and unduly burdensome) and *Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C. 2002) ("Ten years is an inordinate length of time to support plaintiffs' pattern of discrimination theory....in order to establish a pattern of discrimination, three years is a reasonable time in which to allow discovery."). SCA is willing to conduct a discovery conference to discuss a reasonable scope for this request so long as Plaintiffs are willing to enter into a protective order and limit the request to appeals from the Kingdom of An Tir.

REQUEST FOR PRODUCTION NO. 19: Please provide all documentation that supports your answer to Interrogatory No. 10..

RESPONSE:

See Answer to Interrogatory No. 10.

INTERROGATORY NO. 11: Describe in detail the SCA's definition of the difference between rule and policy.

ANSWER: Non-responsive.

SCA is unclear what Plaintiffs are asking for with this request.

1 **REQUEST FOR PRODUCTION NO. 20:** Please provide all documentation of any rules that
2 outlines what the stated purpose/mission of the SCA and how that relates to Diversity, Equity
3 and Inclusion, political speech, hate speech or other protected speech.

**This is a Boilerplate Objection. Time and scope is addressed in the Instructions
section. Defendant fail to specify exactly what rule they are quoting in the 172
pages of documentation they are in reference to.**

4 **RESPONSE:**
5 **SCA objects to the extent that this request is not reasonably limited in time or**
6 **scope. With the understanding that what is sought is from 2018 to present, please see**
7 **Bates Nos. 000259-000431.**

8
9 **REQUEST FOR PRODUCTION NO. 21:** Please provide all documentation of any rules that
10 outlines the role of the peerage, their status within the corporation including but not limited to
11 their rights, privileges, responsibilities, authorities and powers granted to them.

**This is a Boilerplate Objection. Time and scope is addressed in the Instructions
section. Defendant fail to specify exactly what rule they are quoting in the 162
pages of documentation they are in reference to.**

12 **RESPONSE:**
13 **SCA objects to the extent that this request is not reasonably limited in time or**
14 **scope. Without waiver of that objection see Bates Nos. SCA_000259-000421.**

15
16 **INTERROGATORY NO. 12:** Describe in detail what reported sanctions automatically go from
17 the Society Seneschal to the BOD for consideration of further sanctions?

**This is a Boilerplate Objection. Time and scope is addressed in the Instructions
ANSWER: section. Defendant fail to specify exactly what rule they are quoting in the 162 pages
of documentation they are in reference to.**

18
19 **SCA objects to the extent that this request is not reasonably limited in time or**
20 **scope. Without waiver of that objection, see Bates Nos. SCA_000259-000421.**

21
22 **REQUEST FOR PRODUCTION NO. 22:** Please provide all documentation that supports you
23 answer to Interrogatory No. 12

24 **RESPONSE:**
25

See Answer to Interrogatory No. 12.

INTERROGATORY NO. 13: Describe in detail what criteria establishes the reason a “*Kingdom Sanction: Exile*” from the Kingdom may be imposed.

ANSWER: **This is a Boilerplate Objection. Time and scope is addressed in the Instructions section.**

SCA objects to the scope of the request as it is overly broad and unduly burdensome. There are twenty kingdoms with thirty subgroups each. Each has their own documents, handbooks and other governing documents. Subject to and without waiving the foregoing objections and further limiting the response to the Kingdom of An Tir from 2018 to present, see Bates Nos. SCA_000353-000354.

REQUEST FOR PRODUCTION NO. 23: Please provide all documentation that supports your answer to Interrogatory No. 13.

RESPONSE:

See Answer to Interrogatory No. 13.

INTERROGATORY NO. 14: Describe in detail what criteria establishes the reason for a “*Kingdom Sanction: Temporary Removal from Participation in the Society*”.

ANSWER: **This is a Boilerplate Objection. Scope is addressed in the Instructions section. Defendant states the rules for sanctions, however, Defendant fail to specify exactly the criteria that establishes the sanctions rendering this a non-responsive answer.**
SCA objects to the scope of the request as it is overly broad and unduly

burdensome. There are twenty kingdoms with thirty subgroups each. Each has their own documents, handbooks and other governing documents. Subject to and without waiving the foregoing objections and further limiting the response to the Kingdom of An Tir from

2018 to present, see Bates Nos. SCA_000353-000355.

REQUEST FOR PRODUCTION NO. 24: Please provide all documentation that supports your answer to Interrogatory No. 14.

RESPONSE:

See Answer to Interrogatory No. 14.

INTERROGATORY NO. 15: Describe in detail what is the corporation definition of “Sanction.”

ANSWER: This is a Boilerplate Objection. The reason for this objection is unclear.

SCA objects to the scope of the request as it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections see Bates Nos. SCA_000325-000326.

REQUEST FOR PRODUCTION NO. 25: Please provide all documentation that supports your answer to Interrogatory No. 15.

RESPONSE:

See Answer to Interrogatory No. 15.

INTERROGATORY NO. 16: Describe in detail what are the specific sanctions that the BOD can impose based on the bylaws as defined in the “powers of the board” prior to April 1, 2021.

ANSWER: This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Defendant fail to specify exactly what rule they are quoting.

SCA objects that this request is not reasonably limited in time or scope and seeks information related to BOD sanctioning power going back over 50 years. The powers of the BOD are outlined in the bylaws which are produced as Bates Nos. SCA_000303-

000309.

REQUEST FOR PRODUCTION NO. 26: Please provide all documentation that supports your answer to Interrogatory No. 16.

RESPONSE:

See Answer to Interrogatory No. 16.

Assumes facts not in evidence. Defendant has no reasonable expectation that Plaintiffs will misuses this information. This question does not ask for personal, private information about the subject. Policies of the SCA do not apply in litigation nor in the rules of discovery. There is no reasonable expectation of privacy, and no privilege between a member of an organization and a Corporation.

INTERROGATORY NO. 17: Describe in detail what prompted the removal of Emerson Waite?

ANSWER:

SCA objects to this interrogatory to the extent that it is sought to embarrass and harass another former SCA member and is not reasonably calculated to lead to the discovery of admissible evidence. Further, SCA objects to this interrogatory because this request violated Mr. Waite's privacy and SCA's confidentiality policies.

REQUEST FOR PRODUCTION NO. 27: Please provide all documentation that supports you answer to Interrogatory No. 17.

RESPONSE:

See Answer to Interrogatory No. 17.

INTERROGATORY NO. 18: Describe in detail the rule that outlines behavior in/on social media postings on private pages prior to April 2, 2021.

ANSWER: *This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Defendant fail to specify exactly what rule they are quoting in the 9 pages of documentation they are in reference to as it applies to this question.*

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the

1 discovery of admissible evidence to identify all behavioral rules in/on social media going
2 back several decades.

3 Subject to and without waiving the foregoing objections, see Bates Nos.
4 SCA_000422-000431.

5
6 **REQUEST FOR PRODUCTION NO. 28:** Please provide all documentation that supports your
7 answer to Interrogatory No. 18.

8 **RESPONSE:**

9 See Answer to Interrogatory No. 18.

10
11 **INTERROGATORY NO. 19:** Please describe, in detail, what, if any civil action the SCA has
12 ever been involved in including but not limited to all parties involved in the action, stated cause
13 of the action, and the current disposition.

14 **ANSWER:** This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Defendant
fail to specify exactly what rule they are quoting in the 172 pages of documentation they are in
reference to.

15 SCA objects to this interrogatory to the extent that it is overly broad, unduly
16 burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the
17 discovery of admissible evidence. SCA further objects to the scope of the request as it is
18 overly broad and unduly burdensome. There are twenty kingdoms with approximately
19 thirty subgroups each. SCA was founded over 50 years ago and it would be extremely
20 burdensome to locate all civil actions SCA has been involved in throughout the world.
21 Without waiving these objections, see response to RFP No. 20.

22
23 **REQUEST FOR PRODUCTION NO. 30:** Please provide all documentation that supports your
24 answer to Interrogatory No. 19.

25 **RESPONSE:**

See Bates No. SCA_000436-000448.

INTERROGATORY NO. 20: Has any Officer, including but not limited to, members of the chivalry, peerage, royalty, or other like elevated representative, or any other designated representative, been accused or convicted of any civil crime, felony or misdemeanor crime while holding office and/or warrant position within the SCA.

ANSWER: This is a Boilerplate Objection. Time and scope is addressed in the Instructions section.

SCA objects to this interrogatory to the extent that it is overly broad, unduly burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the discovery of admissible evidence and is sought for the purposes of harassment and abuse. SCA is unsure what a “civil crime” is and cannot respond to that term. SCA further objects to the extent that it seeks information that is outside the control or custody of SCA. SCA further objects to the scope of the request as there are twenty kingdoms with approximately thirty subgroups each with various officers, chivalry and peerage. The request is not limited in time or scope and ostensibly seeks information going back over 50 years.

Without waiving these objections, SCA does not have access to criminal records of every member, every officer, or every peer and only become aware of possible crimes when informed by other members.

REQUEST FOR PRODUCTION NO. 31: Please provide all documentation that supports your answer to Interrogatory No. 20.

RESPONSE:

See Answer to Interrogatory No. 20.

1 **INTERROGATORY NO. 21:** How many of those convicted (listed in Interrogatory No. 20) had
2 their membership revoked and when?

3 **ANSWER:** *This is a Boilerplate Objection. Time and scope is addressed in the Instructions section. Pursuant to*
4 *Rule 26(b)(5) Defendants are required to state what is being claimed as privilege and how it qualifies as*
5 *such.*

6 **SCA objects to this interrogatory to the extent that it is overly broad, unduly**
7 **burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the**
8 **discovery of admissible evidence to identify each and every power or right conveyed to**
9 **the Officers over the years. SCA further objects to the extent that it seeks information**
10 **and documents protected by attorney-client privilege and/or work product privilege**
11 **and/or information collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104**
12 **Wn.2d 392, 706 P.2d 212 (1985). SCA further objects to the scope of the request as it is**
13 **overly broad and unduly burdensome. There are twenty kingdoms with approximately**
14 **thirty subgroups each. Each has their own documents, handbooks and other governing**
15 **documents.**

16 **SCA is unable to answer this question as written. In an effort to provide a**
17 **response, of the eighteen revocations from the Kingdom of An Tir reference above,**
18 **eleven of them were for criminal convictions.**

19 **REQUEST FOR PRODUCTION NO. 32:** Please provide all documentation that supports your
20 answer to Interrogatory No. 21.

21 **RESPONSE:** *Assumes facts not in evidence as it implies ill intent of Plaintiff with no documentation to support*
22 *such a conclusion.*

23 **SCA objects to the production of the revocation files for the eleven former An Tir**
24 **members whose membership was revoked for criminal convictions as production of**
25 **those files are irrelevant, sought to harass and embarrass others, and are not likely to**

1 lead to the production of admissible evidence. Without waiver of that objection, see
2 Answer to Interrogatory No. 21.

3
4 **INTERROGATORY NO. 22:** Describe in detail any rule that clearly defines Hate Speech and
5 the sanctions or punishments imposed.

6 **ANSWER:** This is a Boilerplate Objection. Defendant fail to specify exactly what rule they are quoting in the 172
7 pages of documentation they are in reference to.

8 Objection, this request is vague, overbroad and not reasonably limited in time or
9 space. Subject to and without waiver of that objection, see Bates Nos. SCA_000259-
10 000431.

11 **REQUEST FOR PRODUCTION NO. 33:** Please provide all documentation that supports your
12 answer to Interrogatory No. 22.

13 **ANSWER:**

14 See Answer to Interrogatory No. 22.

15
16 **REQUEST FOR PRODUCTION NO. 34:** Please provide all communications and documents
17 that include or reference a members handbook outlining expected behavior and the penalties a
18 member can expect to have levied upon failure to follow the rules as listed.

19 **ANSWER:** This is a Boilerplate Objection. Defendant fail to specify exactly what rule they are quoting in the 172
20 pages of documentation they are in reference to. Pursuant to Rule 26(b)(5) Defendants are required to
21 state what is being claimed as privilege and how it quilifies as such.

22 SCA objects to this interrogatory to the extent that it is overly broad, unduly
23 burdensome, ambiguous, vague oppressive, and not reasonably calculated to lead to the
24 discovery of admissible evidence to identify each and every power or right conveyed to
25 the Officers over the years. SCA further objects to the extent that it seeks information
and documents protected by attorney-client privilege and/or work product privilege

1 and/or information collected in anticipation of litigation (see *Heidebrink v. Moriwaki*, 104
2 Wn.2d 392, 706 P.2d 212 (1985). SCA further objects to the scope of the request as it is
3 overly broad and unduly burdensome. There are twenty kingdoms with approximately
4 thirty subgroups each. Each has their own documents, handbooks and other governing
5 documents.

6 Subject to and without waiving the foregoing objections, see Bates Nos.
7 SCA_000259-000431.

8 DATED this _____ day of September 2023.

9 PREG O'DONNELL & GILLETT PLLC

10 

11 By: _____

12 Justin E. Bolster, WSBA #38198
13 Debra Dickerson, WSBA# 20397
14 Attorneys for Defendant The Society for
15 Creative Anachronism, Inc., a/k/a/ SCA, Inc.

DECLARATION OF RESPONDING PARTY

I declare under the penalty of perjury under the laws of the State of Washington that I, Lis Schraer as the Vice President for Operations of The Society for Creative Anachronism, defendant herein, am authorized to make the foregoing answers. I declare that I have read the foregoing answers, know the contents thereof, and believe them to be true and correct.

Dated this 7th day of September, 2023, at Saint Louis, Missouri.

By: Melissa Schraer
Melissa (Lis) Schraer

For: Society for Creative Anachronism, Inc.

Title: Vice President for Operations

DECLARATION OF SERVICE

The undersigned declares under penalty of perjury under the laws of the State of Washington that on this day the undersigned caused to be served in the manner indicated below a copy of the foregoing document directed to the following individuals:

Counsel for Plaintiffs George DC Parker II and Lori A. Parker:

George DC Parker II
Lori A. Parker
10710 199th Street East
Graham, WA 98338

☐ Via Messenger
☐ Via Facsimile –
☒ Via U.S. Mail, postage prepaid
☐ Via Overnight Mail, postage prepaid
☒ Via Court E-Service or email with
recipient's approval
thenorsegypsyforge@gmail.com

Sep 8, 2023
DATED at Seattle, Washington, this ____ day of September 2023.

Ana I. Todakonzie

Ana I. Todakonzie

Signature: Melissa Schaal

Email: seneschal@sca.org

Signature: Ana Todakonzie

Ana Todakonzie (Sep 8, 2023 15:31 PDT)

Email: atodakonzie@pregodonnell.com